

In The Matter Of:

W.K., et al v.

Red Roof Inns, et al

PL Sum. J.

Ex. 041

Monica Hamilton

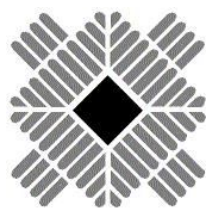
January 19, 2022

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P.,)	
M.B., D.P., A.F., C.A.,)	
R.K., K.P. and T.H.,)	
)	
Plaintiffs,)	CIVIL ACTION FILE
)	
vs.)	NO. 1:20-cv-5263-MHC
)	
RED ROOF INNS, INC., FMW)	
RRI NC, LLC, RED ROOF)	
FRANCHISING, LLC, RRI WEST)	
MANAGEMENT, LLC, VARAHI)	
HOTEL, LLC, WESTMONT)	
HOSPITALITY GROUP, INC.,)	
and RRI III, LLC,)	
)	
Defendants.)	

Videotaped deposition of MONICA HAMILTON, taken on behalf of the Plaintiffs, pursuant to the stipulations contained herein, signature being reserved, in accordance with the Federal Rules of Civil Procedure, before Kelly D'Amico, RPR, Certified Court Reporter and Notary Public, at 1960 Satellite Boulevard, Suite 4000, Duluth, Georgia, on the 19th day of January, 2022, commencing at 10:19 a.m.

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Alexis Digiorgio (via videoconference)
Becca Webb (via videoconference)

- - -

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1 Q Do you recall when in 2016 you stopped
2 working there?

3 A I think it was -- I'd say about May,
4 June, somewhere in there.

5 Q Why did you stop working there?

6 A Because I was tired of getting
7 threatened, shown -- shown guns from guys that was
8 there for me going around telling them they couldn't
9 smoke marijuana or use drugs on the property, that
10 this was no -- no -- they was doing -- having as we
11 called it suspicious activity going on and running
12 from room to room. They had to be in their room at
13 the hotel. They couldn't be out in the parking lot
14 sitting in cars and doing their business or outside in
15 the bushes or doing drugs or anything.

16 So a lot -- I got a lot of threatening
17 threats and I was shown pistols. I got spit on. A
18 guy tried to run me over in a car and a guy wanted to
19 fight and that's why I just got tired. It was just
20 every -- it was like going to hell. I called it the
21 Hotel Hell because that's what I got, a mixture of
22 everything when I worked there on weekends.

23 Q So we'll talk more, I'm going to ask you
24 more about your experiences at the North Druid Hills,
25 but before I do that I want to talk about some other

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1 A Oh, yes, ma'am, I saw a lot of that. I
2 saw a lot of that.

3 Q And how would you record that in your
4 reports?

5 A I would say that it looks like suspicious
6 activity is coming out of, I'll say, Room 201 or 209
7 and I see a lot of people going in and out and I'm
8 smelling marijuana but I can't distinct where it's
9 coming and I'm smelling something. But I see a lot of
10 people going in and out, in and out.

11 And then I would see -- watch and --
12 watch them and they'd go in -- like I said, they'd go
13 in one way, girls. I even noticed some 14-year-old
14 girls there, young. I knew they were underage because
15 they were -- they'd go in like dressed like I am, kind
16 of like me with their hair up. And they'd come out
17 with makeup on, these skimpy outfits and high heels
18 they could barely walk in and trying to look much
19 older than what they were.

20 And the guys they were with and the other
21 older girls that they were with, they got them dressed
22 in this particular room, would leave that room and go
23 rent -- have other rooms in the hotel on the front
24 side. And they would get -- they would have rooms on
25 the back side as well for the girls to take care of

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1 their business, so to speak. And then they would
2 leave the hotel and come back with different people
3 and bring back to the hotel and I would record all of
4 that in my report.

5 And if I had to say something to one of
6 them -- like I said something to them before, to a
7 couple guys that was there before, and they showed me
8 their guns. I don't have a gun, so I'm not fixing to
9 stand there with an ink pen and argue with you. So
10 I'm going to do the best thing. I'm going to call --
11 I'm going to get off -- I'm going to get away from
12 you.

13 I can outthink you because you've been
14 drinking and smoking. So I'm going to outthink you
15 and I'm going to go off where I can call Chief and
16 then I'm going to report it to the front desk after I
17 get off the phone with Chief and he -- and he tells me
18 to call the police, have them removed, and that's what
19 I do.

20 Q Okay. So you said a lot there. I want
21 to break this down a little bit and make sure that
22 we're talking -- that we all understand.

23 So you said that you saw what you believe
24 was commercial sex activity or prostitution happening
25 at the North Druid Hills Red Roof. You also said that

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1 you saw young girls.

2 A Yes.

3 Q What makes you think that those girls
4 were underage?

5 A Because how they act. They acted real
6 immature like little kids. They didn't -- they
7 weren't mature. Because you could talk to them and
8 say hi, he-he-he, they giggle or they do little things
9 like that, like kiddy -- kiddy stuff. And they -- and
10 when the guys say something, they would get scared and
11 they would be quiet. Other than that, that's what
12 gave me the impression that they were young young.

13 Q So what did you see these girls wearing?
14 You mentioned that you saw them sometimes dressed one
15 way and sometimes dressed another. Can you explain
16 that for me?

17 A Yes, when they -- yes, when they came
18 into the hotel, they would have on like a pair of
19 pants or some shorts that wasn't revealing; but when
20 they got ready to go and leave the hotel with the guys
21 and the older girls, they would have on booty shorts
22 as they call it and -- and little bitty skimpy little
23 skirts and tops like this and basically everything
24 showing and high heels like that (indicating). Looked
25 like they were trying to walk in 12-inch stilettos and

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1 didn't know how to.

2 Q How -- did they have on makeup?

3 A Yes. I'm sorry, yes. They had on --
4 they had on makeup. They had heavy makeup put on
5 their cheeks to make them look older than what they --
6 what they were and they had jewelry on and they had
7 their hair done a different way and stuff like that.

8 Q And you said that one of the reasons you
9 thought that they might be underage is because of how
10 they were walking in heels. Can you explain that to
11 me?

12 A A person that -- normally a grown person
13 that's used to working in high heel shoes or
14 stilettos, they don't walk wobbly and stumbly and
15 their ankles like they can't hardly catch their
16 balance like and holding on to things. They were
17 walking stumbly.

18 Q So these girls that you saw, how were
19 they walking?

20 A Stumbly and wobbly.

21 Q Did you -- now, you mentioned that you
22 talked to these girls and that they presented in a way
23 that was immature. Can you tell me more about that?

24 A When I -- when I would say -- if I'd
25 speak, "How are y'all doing tonight," or, "Do you need₉₀

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1 anything? I'm Officer" -- introduce myself to them,
2 they'd be like, "Eh," or they'll start laughing and
3 they'd be like, "No, no, don't talk to her. Don't
4 talk to her. You know we can't talk to her." Stuff
5 like that they would say.

6 And they would walk off and they'd go in
7 their rooms or they'll go knock on -- when I'd leave,
8 when they think I've left and I just turned the corner
9 just to peep back around the corner where they can't
10 see me, I'd see them knock on the room door down and
11 the guy come out and they'd tell the guy and he puts
12 them in this room.

13 And then they go again. They change.
14 They go to another room and change clothes and go back
15 out and leave again and come back with different
16 people.

17 And they were -- and the way they were
18 walking was -- it was not like a normal -- all right,
19 a grown lady walks, a mature person walks in
20 high-heeled shoes and --

21 Q You --

22 A I'm sorry.

23 Q You mentioned that -- you mentioned that
24 they were often with men and other older women.

25 A Yes.

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1 Q What did you -- what were those
2 interactions like? What did you see in terms of how
3 these girls interacted with the other women and the
4 men?

5 A Well, the men was basically telling the
6 older girls what to do and the older girls would tell
7 them and take them in the room. They'd take them in
8 the room. They'd dress them. They'll take them
9 shopping. They'd come back. Then they dress them.
10 They do their hair and their makeup, nails or whatever
11 and put them in an outfit and they'd keep them in
12 there.

13 And then when they come out, when they
14 get ready to go after the guys come out from their
15 room, which is like the next door, not two doors, and
16 he'll go in there and go in the room where they're at
17 getting dressed, and then that's when I smelled a lot
18 of drug activity again, a lot of marijuana that I put
19 in my reports. And -- and they would come out --

20 Q I'm sorry, I want to make sure I
21 understand. You said that these older women would
22 take them shopping. Do you mean that they would go
23 shopping in the hotel room?

24 A No, no. Take them -- they'd take them to
25 go shopping and buy outfits to wear that night if

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1 they --

2 Q Okay.

3 A And then they would (overspeak) --

4 Q So you would see them leave in one way?

5 A And come back another way or --

6 Q Okay.

7 A -- either come back the same way they
8 left but they're toting bags of clothing from
9 different stores and shoes and everything and bringing
10 it in that one room. Like I said, that room on the
11 third -- on the second floor at the top in that
12 corner, that -- above the office, that was the room
13 that was -- they were always in a lot. That's the
14 room that everybody went to. That's the room the
15 girls was in. That's the room I seen the young girls
16 coming out of before I seen them go down to different
17 rooms and where they had drugs at. I knew there was
18 drugs in the room because when they opened the door
19 all you seen was smoke come out of the room.

20 So it was just that -- that room there,
21 like I said, was the main room where they got dressed
22 at. And the guy gave instructions to the older girls
23 and the older girls -- because I know they had gave
24 the girls, young girls the instructions because one of
25 the older girls told her, "Come on, don't say nothing,"₉₃

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1 just come on, get in the car or you're going to be in
2 trouble because you didn't do this and you didn't do
3 that. You just wait until we get there." And so
4 that's what made me know that they were underaged
5 girls.

6 Q So you would hear the older women give
7 instructions to the younger girls that would be like
8 what? What sort of things did you hear?

9 A Just that you go -- you got to go where
10 you're told to go and, you know, what time to be back,
11 we're going to drop you off and you just got to be
12 here, and right now we're going to all go here.

13 Because if they see me, they would say --
14 they all would leave at one time. They'd pile up in
15 the cars. Even the guys would pile up and they would
16 follow each other out in different vehicles. And when
17 they come back out of the two vehicles, they might
18 bring three or another vehicle or two more vehicles
19 behind them and they go up to different rooms in all
20 of these rooms they had.

21 And they go in there and they start
22 partying in the rooms and they would go from room to
23 room to room. And there was a girl in this room, that
24 room, this room, that room on the back side, the same
25 girls out of that one room.

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1 like I said, I would try to get around to where they
2 couldn't see me till I could get on the floor where
3 they was to get closer and when I did that they would
4 disburse.

5 And the girls would always end up be
6 crying or upset, real upset or like nervous and stuff
7 and then they'd go in the room and shut -- shut the
8 door and wouldn't come back out until the guy knocked
9 on the door again. And I would watch him. I would
10 watch him to see where he -- where he was going. So
11 that's how I knew where the girls were, by watching
12 him and the other guy.

13 Q Did it appear to you that the women were
14 being controlled by their pimps?

15 A Yeah, like they were brainwashed. That's
16 what it was like. It was like they were brainwashed
17 and they couldn't make their own decision, they
18 couldn't say what they wasn't going to do or what --
19 you know. "I did this, I did this for you, I bought
20 you this." And they couldn't -- they couldn't never
21 make up their own mind not even when it came to what
22 you want to eat. Somebody asks you what you want to
23 eat, for example. He tells them what they -- what
24 he's going to get them. That's what they're going to
25 eat. I've heard that.

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1 Q Did you hear -- you heard?

2 A Yes, I've heard that.

3 Q So tell me more about that.

4 A All -- they would say like -- one lady,
5 one young girl/lady she was there. Like I said --
6 like I said, she was about 14 years old. I remember
7 her, but I can't remember her face. And she was kind
8 of petite and she was -- you know, she was young.
9 Like I said, they had her dressed up. And she kept
10 saying she was hungry and she wanted I think it was a
11 burger and he wouldn't -- he told her, no, she wasn't
12 getting a burger, she could get this pizza, a couple
13 of slices of pizza and that was it. So, and she
14 better be satisfied with it because he spent his money
15 on her. That's what I heard.

16 Q This is -- this is a conversation that
17 you heard yourself?

18 A Yes.

19 Q Do you remember approximately when that
20 conversation happened, when you heard that?

21 A No, ma'am, I don't, but I think it's in
22 one of my reports. Because I made plenty, plenty
23 reports about everything that happened there.

24 Q So you said that you would -- you also
25 saw men coming and going on the back side.

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1 Q And how long would those men typically
2 stay in the rooms?

3 A Like I said, 20 to 30 minutes at the
4 most.

5 Q Was that true for the construction
6 workers and for other men who came to the property?

7 A Yes. Unless it was a construction
8 worker's payday or something and they had a drug habit
9 or something. Then they would stay in the room. They
10 would rent another hotel room and stay in that room
11 and they would work out of that -- that person's room.

12 Q Okay. Explain that to me. I'm not sure
13 I know what you mean.

14 A That means if he's -- he's rented the
15 hotel room. He's got paid. So instead of sending
16 him -- they know that he -- that he has a drug habit,
17 so they're trying -- selling him drugs and bringing
18 drugs to his room, tell him to stay in the room. They
19 bring the girls and drugs and all to the room where he
20 doesn't have to go or anything. They go get it for
21 him and everything, but she stays right there with him
22 all night.

23 Q When you say "they," who do you mean?

24 A The pimps.

25 Q How often did you see activity like this₁₀₂

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1 at the North Druid Hills Red Roof?

2 A Almost every -- well, I know it was every
3 weekend I worked there. I can't think about maybe
4 two -- two nights on a Sunday that I didn't see any
5 activity, I think. Out of all the years I worked
6 there, that's about the only time, twice, but
7 basically this was a regular thing. Because I would
8 tell -- I would notify management through my reports.
9 I would tell the front desk. I even had front desk
10 workers tell me I'm harassing the cust- -- the
11 customers, leave the guests, leave them alone and
12 that -- that I needed to just -- just go on and don't
13 pay them no attention; but I had a job to do.

14 Q So you worked at the North Druid Hills if
15 I'm remembering correctly from February 2013 to
16 roughly June 2016; is that correct?

17 A Yes, ma'am.

18 Q And so you're saying in that three-plus
19 years you saw this sort of activity every weekend you
20 worked there; is that correct?

21 A Yes, ma'am, except for two nights.

22 Q How many weekends a year do you think you
23 worked there? If there were 52 weekends in a year,
24 how many weekends a year do you think you worked at
25 the North Druid Hills location?

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1 A They would -- they would act -- they
2 would still rent the same rooms out to them. They
3 know that they weren't supposed to be on the property,
4 been put away from the property, still let them come
5 back, allowed them to come back, rent rooms out to
6 them, and then they -- when I reported that this
7 person like is not supposed to be on the property and
8 they're in this room, "Well, no, no, we decided to let
9 them rent a room. We have the obligation -- we have
10 the right to decide if they -- if they can rent a room
11 or not."

12 And so they would still rent them rooms
13 and I would tell them, "Well, this is what has been
14 going on. This person here, I've got -- I've got a
15 lot of people running in and out of this room, I've
16 got a lot of -- a lot of girls running up and down the
17 stairs half dressed and naked and running from room to
18 room on the front and the back, in the cars and
19 everything."

20 I told them. And I told them that and
21 they knew. They just didn't care really. Not the --
22 not the corporation. I'm just talking about the
23 employees that I met. Like I said, Marty, he didn't
24 care.

25 Bernard was like, "Oh, just -- just look

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1 away, don't" -- you know, but he -- he -- Bernard
2 didn't ever tell me not to call the police. He even
3 said he would call the police.

4 But Marty, Marty didn't want me to call
5 the police. He just wanted -- he said I was harassing
6 the people and the guests and to leave them alone, I'm
7 not there to harass, I'm there just to walk the
8 premises and be quiet, and that's where we had
9 problems at.

10 Q Okay. So I'm going to ask you just a few
11 more questions about -- about how you got to this
12 place.

13 How did you first learn about this case,
14 about this lawsuit?

15 A Well, it was a lady named Ms. Cathy
16 McCarthy. I believe that's her name. She's a private
17 investigator. She called me on the phone right after
18 Christmas and asked me was I the same Monica Nash that
19 used to work at North Druid Hills in Georgia. And I
20 said, "Yes, I am," and she said, "Oh, good." She said
21 that Attorney Jon and Patrick was trying to reach me
22 and that she's been looking for me for a while.

23 And so when she called -- so when -- I
24 told her she -- after I talked to her and she said,
25 "You worked at North Druid Hills," I said, "Yes, I

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C E R T I F I C A T E

I hereby certify that the foregoing transcript was reported, as stated in the caption; that the witness was duly sworn and elected to reserve signature in this matter; that the colloquies, questions and answers were reduced to writing under my direction; and that the foregoing pages 1 through 193 represent a true, correct, and complete record of the evidence given.

I further certify that I am not disqualified for a relationship of interest under O.C.G.A. 9-11-28(c); that I am a Georgia Certified Court Reporter here as a representative of D'Amico & Associates; that I/D'Amico & Associates was contacted by the party taking the deposition to provide court reporting services for this deposition; that I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 10.B of the Rules and Regulations of the Board; and by the attached disclosure forms I confirm that I/D'Amico & Associates is not a party to a contract prohibited by O.C.G.A. 15-14-37 (a) or (b).

The above certification is expressly withdrawn and denied upon the disassembly or photocopying of the foregoing transcript, unless said disassembly or photocopying is done under the auspices of D'Amico & Associates and the signature and original seal is attached thereto.

This, the 8th day of February, 2022.



KELLY D'AMICO, RPR, CCR-B-1322